

**MADELINE SINGAS**  
DISTRICT ATTORNEY

CONVICTION INTEGRITY DIVISION  
Sheryl Anania, Executive

APPEALS BUREAU  
Tammy J. Smiley, Chief



**OFFICE OF THE DISTRICT ATTORNEY  
NASSAU COUNTY**

June 16, 2020

Hon. Anne M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 4GN  
Brooklyn, New York 11201

Re: *Scrimo v. Lee*, 11-CV-4171 (AMD)

Dear Judge Donnelly:

I am writing to inform this Court of the steps the State has taken to continue to fulfill its obligation, pursuant to the order of the United States Court of Appeals for the Second Circuit, to take “concrete and substantial steps to expeditiously retry Scrimo.” *Scrimo v. Lee*, No. 17-3434, 2019 WL 3924811 (2d Cir. August 20, 2019) (granting Scrimo’s petition for writ of habeas corpus). Since respondent’s last update, defendant has retained new counsel and has been represented by Earl Ward, Esq. and Julia P. Khan, Esq. Defendant’s case was most recently before the court on June 10, 2020. Defense counsel submitted an application for a reduction of bail on June 12, 2020, and the People’s papers are due in response on June 19, 2020. The case was adjourned to June 24, 2020, at which time the court will give its ruling. All parties continue to deal with the effects of the COVID-19 pandemic on the criminal justice system, and both sides are preparing for trial, which is expected to commence in the near future. Thank you for your attention in this matter, and if there are any questions, please do not hesitate to contact me.

Respectfully yours,

**MADELINE SINGAS**  
DISTRICT ATTORNEY

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